

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: John A D'Andrea, Jr
Debtor.

SN Servicing Corporation as
servicer for U.S. Bank Trust
National Association, as Trustee of
Chalet Series III Trust

Movant

v.

John A D'Andrea, Jr,
Christina M. D'Andrea - Co-Debtor
William C. Miller - Trustee
Respondents.

CASE NO.: 19-10865-elf

CHAPTER 13

JUDGE: Eric L. Frank

HEARING DATE:

OBJECTION DEADLINE:

**DECLARATION IN SUPPORT OF MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

I, Jessica Hunter, certify the following to be true under penalty of perjury:

1. I am employed as a Bankruptcy Asset Manager for SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of Chalet Series III Trust (the "Movant") and am authorized to execute this declaration on behalf of Movant. This declaration is offered in support of the Motion for Relief from the Automatic Stay and Relief from the Co-Debtor Stay annexed hereto.

2. In my capacity as BK Asset Manager, I have access to Movant's business records, including the business records for and relating to the loan of the Debtor, John A D'Andrea, Jr, secured by the real property known as 26 Cliff Road, Levittown, PA 19057 (the "Property"). The facts stated in this declaration are based upon information that I have obtained by reviewing records maintained in the ordinary course of business, as part of regularly

conducted business activity, by or from information transmitted by person(s) with knowledge of the events described therein, at or near the time of the event described.

3. According to business records, the Debtor has executed and delivered a Note dated May 30, 2007, in favor of Cardinal Financial Company (the “Original Lender”), in the original principal amount of \$217,600.00. The Note is secured by a Mortgage executed and delivered by the Debtor and the non-filing co-mortgagor, Christina M. D’Andrea, to Mortgage Electronic Registration Systems, Inc. as nominee for Original Lender.

4. As of February 11, 2019, the total obligations to Movant less any partial payment and suspense balance is \$206,312.57, per claim 4-1 filed on April 3, 2019.

5. As of September 19, 2020, the Debtor is post-petition due for March 1, 2020. The post-petition default is broken down as follows:

<u>Due Date</u>	<u>Missed Payment Amount</u>	<u>Running Suspense Balance</u>
03/01/2020	\$1,289.70	\$647.36
04/01/2020	\$1,289.70	\$647.36
05/01/2020	\$1,289.70	\$647.36
06/01/2020	\$1,289.70	\$647.36
07/01/2020	\$1,289.70	\$647.36
08/01/2020	\$1,289.70	\$647.36
09/01/2020	\$1,289.70	\$647.36
TOTAL:	\$9,027.90	\$647.36

Post-Petition Payment Breakdown

Principal and Interest.....	\$806.70
Escrow.....	\$483.00
Late Charges.....	\$0.00
Other.....	\$0.00
TOTAL.....	\$1,289.70

6. The total amount of post-petition arrearage/delinquency is \$9,743.58, which includes \$9,027.90 in post-petition payments arrears, \$242.04 in accrued post-petition late fees, \$90.00 in NSF fees, attorney’s fees and costs in the amount of \$1,031.00, less \$647.36 in

Debtor's post-petition suspense. The next post-petition payment will become due on October 1, 2020 in the amount of \$1,289.70.

7. I hereby certify, under penalty of perjury, that the foregoing is true and correct.

Executed this 6th day of October, 2020

/s/ Jessica Hunter

Signature

Jessica Hunter

Name

BK Asset Manager

Title